

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF WILSTON L. PARRIS

I, Wilston L. Parris, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center (“WTC”) Towers occurred. At the time of these horrific attacks, I worked as a server at the Greenhouse Restaurant in the New York Marriott World Trade Center Hotel located at Three WTC. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment at the Greenhouse Restaurant at the time of these terrorist attacks.

4. On the morning of 9/11, I had begun my shift as a server in the Greenhouse Restaurant, which was located on the Concourse Level of the hotel. As I handled server duties for various customers in and around the breakfast buffet area, I heard a loud explosion. I looked outside of one of the glass windows of the restaurant and I saw large amounts of building debris falling to the ground. I later learned that the debris fell after the first passenger jet, American Airlines Flight 11,

crashed into the upper section of the North Tower. As the debris fell from the North Tower, I turned away from the window and I watched in horror as building debris crashed through the glass ceiling of the restaurant. The debris landed near my position and two of my restaurant customers were killed during the impact. Everyone inside of the restaurant began to scream and panic, and the restaurant immediately caught fire.

5. More debris fell from above and the windows and the ceiling of the restaurant began to collapse. I saw people being injured from the falling glass and building debris. I covered my head with a chair to avoid being hit by the falling debris. As I attempted to escape from the restaurant, I fell to the ground as I was struck by falling debris and glass. The impact of the debris caused injuries and lacerations to my right hand, neck, back, and right knee. Despite the pain from my injuries, I crawled to the exit door of the restaurant and onto the Plaza level of the building.

6. As I arrived in the Plaza area, I was immediately struck by more falling debris. I saw horrific images as I continued to try to escape from the area, including a dead body that was still strapped into an airline seat and body parts that were scattered around the area.

7. I decided to go to Church Street to get to safety. As I left the Plaza area of the hotel, I saw a second passenger jet, United Airlines Flight 175, slam into the South Tower. Additional building debris began to fall all around me. As I continued to walk away from the area, I heard another loud noise and I looked back to see that the South Tower had begun to collapse. A massive cloud of dust and building debris surrounded me, and I inhaled large quantities of these hazardous substances into my lungs and airways.

8. I began to crawl on my hands and knees through the debris cloud while screaming for help as I continued to inhale massive amounts of dust and building debris. After being trapped by the debris cloud for approximately twenty minutes, a security officer with a flashlight found me and helped

me to my feet. I then held hands with a group of survivors as the officer led us inside the entrance of a bank building to escape the debris cloud. Once inside of the bank, I went into the bathroom and I began to cough up some of the building debris that I had inhaled, and I had great difficulty breathing.

9. Another survivor helped me to walk up a set of stairs within the bank, and I received initial medical treatment and an oxygen mask. Due to the intense burning of my eyes, I also received liquid drops. A police officer then transported me to New York University Hospital where I received additional treatment for my numerous injuries.

10. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: a right knee sprain¹; a left shoulder injury²; a neck injury³; a back injury⁴ with bulging cervical discs; eye irritation⁵; a right hand injury⁶; serious ingestion and inhalation injuries due to the large quantities of debris and toxins that I inhaled, including chronic rhinitis⁷, asthma⁸, an upper respiratory disease⁹, obstructive airway disease¹⁰, and gastroesophageal reflux disease¹¹; and lastly, prostate cancer¹² that required radiation treatment. Lastly, I have been diagnosed with post-traumatic stress disorder¹³ due to the horrific events that I witnessed on 9/11.

11. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct

¹ See, Medical Records of Wilston L. Parris (PARRIS_MEDS_000001), attached hereto as Exhibit C, at 0004-0005, 0007-0012, 0020, 0024-0030, and 0044-0045.

² *Id.* at 0010, 0020.

³ *Id.* at 0019-0020, 0022-0030, and 0044-0045.

⁴ *Id.* at 0003, 0007-0010, 0012, 0020-0030, and 0044-0045.

⁵ *Id.* at 0004.

⁶ *Id.* at 0010.

⁷ *Id.* at 0003, 0010-0011, and 0047-0048.

⁸ *Id.* at 0003, 0010-0011, and 0046-0048.

⁹ *Id.* at 0001, 0010-0011, and 0046-0048.

¹⁰ *Id.* at 0001, 0010-0011, and 0046-0048.

¹¹ *Id.* at 0001, 0003, 0014, and 0019.

¹² *Id.* at 0001, 0003, and 0049-0050.

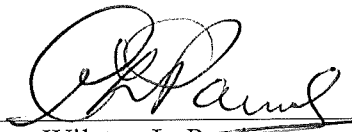
¹³ *Id.* at 0013-0018, and 0032-0043.

copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

12. I previously pursued claims (Claim Numbers 212-002696 and 0037098) through the September 11th Victim Compensation Fund (VCF I and VCF II) specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 27 day of January 2022


Declarant Wilston L. Parris

**CITIZENSHIP
AND
MEDICAL
EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**

Exhibit B

Proof of Employment



Marriott International, Inc.
Corporate Headquarters

Marriott Drive
Washington, DC 20058

Maria Ko
Program Manager
HR Field Services
Phone: (301) 380-2996
Fax: (301) 380-3837

March 26, 2002

To Whom It May Concern:

This letter is to verify that Wilston Parris, Social Security _____, was an associate of the New York Marriott World Trade Center, and had worked for Marriott International, Inc. since September 8, 1981.

Due to the tragedy on September 11, 2001, and the subsequent loss of the New York Marriott World Trade Center located at 3 World Trade Center, Wilston Parris is no longer employed by Marriott International. Wilston Parris has received pay through October 5, 2001, and will maintain medical and dental insurance for one year.

During his employment at the New York Marriott World Trade Center, Wilston Parris worked as a Server in the Greenhouse Restaurant Department, earning an hourly rate of _____ plus gratuity. He was a full-time employee working an average of 40 hours.

If you have any additional questions, please contact me at 1-800-638-8108, extension 82996.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Maria Ko'.

Maria Ko
HR Program Manager
HR Field Services

212-002694-0442